

Portland Public School District 1st Reading

DATE OF FIRST READING: DECEMBER 13, 2022

PUBLIC COMMENT FOR **Policy 4.10.020-P:** **Compulsory Enrollment; Age and** **Grade Level at Entrance**

The Portland Public School District is providing Notice of Proposed Revised Policy and Public Comment to offer interested parties reasonable opportunity to submit data or comments on the proposed policies noted below.

Public comment may be submitted in writing directly to the district or through the district website noted below. Written comments must be submitted by 5:00pm on the Last Date for Comment listed below.

Open for Comment Until (at least):
January 03, 2023

Summary: **Revision of Compulsory Enrollment; Age and Grade Level at Entrance Policy 4.10.020-P**

1st Reading by: **Director Eilidh Lowery**
Portland Public School Board, Policy Committee Chair

Recommended for a 1st Reading by:
Portland Public Schools Board of Education
Policy Committee

Draft Policy Web Site: <http://www.pps.net/draftpolicies>

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Draft Policy Comment Form: <https://forms.gle/VqYbmVA36qqADj6n6>

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PORTLAND PUBLIC SCHOOLS

OFFICE OF PK-5 CORE ACADEMICS

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Date: November 28, 2022
To: Board Policy Committee
From: Emily Glasgow, Senior Director PK-5 Core Academics
Subject: Staff Analysis Report to the Board- Compulsory Education Policy Revision
Policy # and Name: 4.10.020-P Compulsory Enrollment: Age and Grade Level at Entrance

BACKGROUND

For many years, per [Board Policy 4.10.020](#) and [Admin Directive 4.10.033](#), our Talented and Gifted (TAG) Office has been tasked with administering our Early Entry into Kindergarten process. In 2021, we shifted management of this process from TAG to our Early Learners Department to better align it with other Kindergarten supports. This process allows for families of students who turn 5 between September 2 and October 1 to apply for an exception to our September 1 birthdate requirement for Kindergarten entry. Families must file an independent application, pay for private intelligence testing, and procure a recommendation letter from a preschool provider to complete the process. We are concerned that continued support of this process is in conflict with our district vision, strategic plan, equity lens, and Early Learner Core Values.

RELATED POLICIES/BEST PRACTICES

As a district, we have spent the past several years realigning our approach to Kindergarten orientation to focus not on whether students are “ready for Kindergarten,” but on whether our Kindergarten programs are ready for kids. We have worked to align limited resources with work that ensures that families and students from our historically underserved communities have supported access to high-quality PreK experiences and supported transitions to Kindergarten. And, we have worked to reimagine an approach to Kindergarten that meets the needs of all early learners who, by definition, enter school with a wide range of entrance capacities, assets, and needs.

ANALYSIS OF SITUATION

Over four years, we have reached this recommendation through the analysis of historic and recent racialized demographic trends of applicants and acceptance rates for the Early Entrance to Kindergarten exception. We have also analyzed the internal resources needed to support the current policy, the concerns that families have raised about cultural and linguistic bias inherent in the assessment process, and the evolving and expanding availability of high-quality PreK programs in and around PPS. Please find the results of this analysis below:

Historic Demographic and Recent Trend Data:

- Since 2009, an average of approximately 39 early entry to kindergarten applications were submitted to the Talented and Gifted education department each year. About 50% of those applications were approved. The number of applications ranged from 11 in

2010-2011 to 55 in 2015-16 and the percent approved ranged from 27% in 2010-2011 to 92% in 2020-21.

- In the 2021-22 school year, we had 27 Early Entry to K applicants. Of these, 24 were approved (some with formal testing requirements waived or adjusted). 23 of the 24 matriculated from private tuition-funded PK programs. The table below illustrates the racial demographics of the 24 approved:

| 2021-22 | |
|------------------------------|--------------------------|
| Racial Demographic Group | Number Students Approved |
| White | 15 |
| Asian | 3 |
| White/Asian (multiracial) | 3 |
| Black/African American | 2 |
| Black/Hispanic (multiracial) | 1 |

- The table below illustrates the percent of early entry to kindergarten applications that were approved varied across racial and ethnic demographic groups between 2009 and 2014. For example, on average 65% of applications from White students were approved, while only 30% of applications from Black students were approved.

| 2009-2014 | | |
|--------------------------|--------------------------------|-------------------------|
| <i>Demographic group</i> | <i>Percent of applications</i> | <i>Percent approved</i> |
| Asian | 3.40% | 54.25% |
| Black | 7.60% | 30.00% |
| Latinx | 4.60% | 43.25% |
| Pacific Islander | 1.80% | 50.00% |
| Two or more (HU) | 11.60% | 40.00% |
| Two or more (not HU) | 4.60% | 60.00% |
| White | 43.20% | 65.00% |
| Unknown | 23.20% | 34.80% |

Resources required to support the process:

History of in-district v out-of-district testing: PPS School Psychs used to administer testing. Approximately 8 years ago, we could not find any PPS psychs who were available to conduct testing during the school day, as they were all working full time. We hired a retired PPS psych, but when she was no longer available, we started telling families they would need to seek their own testing. This creates an inequity, even with sliding scale options.

Administrative support: For the past several years, one of our TAG TOSAs has designated 5-10 hours between winter and spring to respond to family requests, collect and review application

materials, and respond to families' applications. Our Early Learners Department often receives and responds to inquiries about this process as well.

Concerns that the assessment is cost-prohibitive and culturally/linguistically-biased:

The Wechsler Preschool and Primary Scale of Intelligence, Revised (WPPSI-R) must be administered by a trained practitioner, typically an Educational Psychologist. The assessment can take up to two hours and is financially prohibitive for many families. Estimated costs are as low as \$400 for families with documented need to \$1100 or more. Especially during the pandemic appointments can be difficult to obtain and require access to transportation and time. Additionally, there is no oversight of private assessment providers, the quality of assessment administration and interpretation varies, and results can be impacted by the implicit racial and linguistic bias of providers.

Furthermore, the WPPSI-R is not a valid index of cognitive ability for bilingual children. In researching the validity of this assessment to measure readiness for kindergarten our team learned, "the WPPSI-R is not measuring the same verbal or general factors in bilingual children as in monolinguals. Consequently, these scores cannot be interpreted as valid indicators of either verbal intelligence or general intellectual ability in bilingual children."

(Using the WPPSI-R with Bilingual Children: Implications for Practice, Mary diSibio and Thomas Whalen, CSU, Hayward 2000.)

Evolving logic of the need for an early entrance process:

PreK availability: In the past, there were few free PreK slots available to families who did not qualify for Head Start. As a result, families living just over the poverty line whose child missed the K age cut-off might have paid an average of \$600- 1,200 per month for an additional year of Pre-K. Therefore, it was financially supportive of families to offer an early entry option. However, with the ongoing expansion of free PreK through Preschool Promise and Preschool for All, more and more of our families of 4 year olds have access to free public PreK.

Later registration trends: Another consideration is the growing trend of families enrolling their Kindergarten- age students a year later. In 2016, 4.22% of K students were actually eligible for 1st grade. This year, 5.62% of K students are eligible for 1st grade. The impact is a widening range (4 year olds - 6 year olds) in ages, ability, etc in a K classroom. This widening range further problematizes the entry of very young children into the program.

FISCAL IMPACT

These changes will incur no financial impact to the district.

COMMUNITY ENGAGEMENT

As part of our review and analysis process, we sent a feedback survey to Kindergarten educators and also made a feedback survey available to families on our Kindergarten website. We received very few responses from either stakeholder group. Our Early Learners team also conducted follow-up interviews with families who engaged in the Early Entry to K process over the past year. While a small number of families expressed the importance of this exception for their children, most also articulated the inequities and challenges for families embedded in the current process. Lastly, in response to a TAGAC letter of concern, we wrote this [detailed response](#) to the TAGAC leadership. We have not yet heard back since our response was sent on November 2, 2022.

RACIAL EQUITY AND SOCIAL JUSTICE LENS

Through this study of historic demographic data and the EE to K policy in practice, we have found the policy to be deeply inequitable in that it requires the allocation of limited staff resources to support a small and arbitrary set of students to access a "work-around" to our

Kindergarten enrollment policy. Because this policy pertains only to students who turn 5 between September 2 and October 1, it places an arbitrary and unfounded emphasis on birthdates as a measure of “Kindergarten readiness.” Furthermore, it places the burden on families to learn about the process, gather recommendation forms from caretakers, and solicit and fund external evaluations. As the data in our historical analysis demonstrates, this policy has generally served to allow a small subset of middle-upper class white families to apply for and be granted early entrance to our Kindergarten classrooms. Despite increased outreach and notification efforts over the past two years, we continue to see that this policy primarily supports the interests of a small number of white, middle or upper class families matriculating from private, tuition-funded PK programs.

TIMELINE FOR IMPLEMENTATION/EVALUATION and COMMUNICATION PLAN

If the Board Policy Committee decides to move this forward to a Board vote, we suggest a January vote. This would allow us to communicate the change in policy out to prospective Kindergarten families by early February, in alignment with our 2023 Connect to Kindergarten district-wide launch.

STAFF RECOMMENDATION

Having taken historical data and current trends into consideration, the Enrollment & Transfer Center, Early Learners Department, and TAG Department are in agreement that the most equitable and logical decision would be to *abandon our early entry to K policy and practice*, beginning in January 2023. This would require us to rescind [Admin Directive 4.10.033](#) and make a small modification to [Board Policy 4.10.020](#). And, moving forward, all students who are not 5 by September 1 would need to enroll in a PreK program.

ATTACHMENTS

- A. [Redline copy](#) of Compulsory Education Policy



Board Policy

4.10.020-P

Compulsory Enrollment; Age and Grade Level at Entrance

All children between the ages of 6 and 18 years who have not completed the 12th grade are required to regularly attend public school full-time, unless exempted by ORS 339.030 and PPS 4.10.010-P.

- 1) Preschool through First grade: Admission is allowed for children whose birthdays occur on or before September 1, as follows:
 - a) Preschool: A child is eligible to apply for Preschool if their third birthday occurs on or before September 1.
 - b) Pre-Kindergarten: A child is eligible to apply for Pre-Kindergarten if their fourth birthday occurs on or before September 1.
 - i) A child whose fifth birthday occurs on or before September 1 is not eligible for Pre-Kindergarten.
 - c) Kindergarten: A child will be admitted to Kindergarten if their fifth birthday occurs on or before September 1.
 - i) A student whose sixth birthday occurs on or before September 1 may enroll in Kindergarten if they have not successfully completed a kindergarten program.
 - ii) If the parent/guardian wishes, a student who has been enrolled in Kindergarten outside of PPS may be placed in Kindergarten when entering the District during the school year, even if their birth date occurs after September 1.
 - d) First Grade: A child will be admitted to the first grade if their sixth birthday occurs on or before September 1, or with evidence of successful completion of a kindergarten program.
 - i) A child whose sixth birthday occurs after September 1 who has been enrolled in first grade outside of PPS will be placed in first grade when entering the District during the school year.

- 2) Second through Twelfth Grade: A student newly enrolling in PPS will be assigned to a grade based on their or prior school experience:
 - a) A student who has successfully completed a grade level will be enrolled in the next grade level when entering the District at the start of a school year.
 - b) A student who has been enrolled in a grade level outside of PPS will be placed in that same grade level when entering the District during the school year.



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- c) A student who is newly enrolling without educational records from a previous school will be placed in the appropriate grade level based on their age. Course selection for a middle or high-school student will occur in collaboration with the student, family, counselor and other school staff, and take into consideration student skill level and necessary high school graduation requirements.
- 3) Students 19 years of age: Students who turn 19 years of age during the school year shall continue to be eligible for a free and appropriate public education for the remainder of the school year.
- 4) Students 21 years of age: The District shall admit otherwise eligible students who have not yet attained 21 years of age prior to the beginning of the current school year if they are shown to be in need of additional education in order to receive a diploma or are receiving special education services and have not yet received a regular high school diploma. These students may attend school without paying tuition for the remainder of the school year.
- 5) Nothing in this policy prevents a family from seeking grade acceleration or retention, as allowed in [Policy 4.20.010-P](#).

Legal References: ORS 327.006; ORS 336.092; ORS 336.095; ORS 339.115

History:

Adpt 9/71; Amd 9/73; Amd8/81; Amd 10/27/83; Amd 8/95; Amd 9/9/02; BA 2420: Amd 4/19; __/22.



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Draft 10/18/22

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